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US EPA RECORDS CENTER REGION 5



467486

June 2, 2005

VIA FACSIMILE & CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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U. S. Environmental Protection Agency
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bodman
ATTORNEYS & COUNSELORS

Re: Unilateral Administrative Order Issued to CSX Transportation, Inc.
Regarding the N-Forcer Site in Dearborn, Michigan
Docket Number: [Not Decipherable]
Date: May 17, 2005

Dear Messrs. Kelly and Krueger:

This letter is CSX Transportation, Inc.'s request that the administrative records for the site and for the § 106 order be supplemented with the following materials:

Sampling Results

ARCADIS letter of February 5, 2005 reporting on soil sampling conducted by CSXT in November, 2004.. (USEPA already has a copy of that letter)

The "follow up letter" from the lab which performed the analysis of ARCADIS' November sampling, clarifying issues raised by USEPA at the May 27 meeting with CSXT. This letter is expected within 2 business days and will be submitted to USEPA as soon as it is received.

Full laboratory documentation for the ARCADIS November sampling. This documentation has been requested from the lab and will be submitted to USEPA within 5 business days.

Sampling data and full laboratory documentation for soil and air sampling conducted on May 24 and 25, 2005 by CSXT. The preliminary results were shared with USEPA on May 27. Summary data tables will be provided by close of business on June 3 with full laboratory documentation to follow as soon as it is available.

Full laboratory documentation for all soil and air sampling conducted by USEPA or its contractors at the site.

Mr. Brian Kelly
Thomad Krueger, Esq.
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All field reports and photographs made by USEPA and its contractors with regard to any sampling conducted at the site and all diagrams depicting the location of samples.

Risk Related Materials

ASTDR's Toxicological Profile For Asbestos (September 2001). We assume USEPA has a copy but can provide a copy for the record if needed.

Department of Community Health, Press Release, *Past Workers at Dearborn Plant Were Exposed To Hazardous Asbestos Levels* (November 9, 2004) (enclosed)

ATSDR/Michigan Department of Community Health, PowerPoint presentation, Dearborn Michigan public information meeting, December, 2004 (enclosed)

Regulatory Status of Asbestos Materials¹

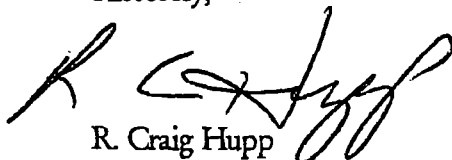
Wylie A.G., Verkouteren, J.R. Amphibole asbestos from Libby, Montana: Aspects of nomenclature. *Am Mineral* 85:1540-1542 (2000) (enclosed)

Bandli, B.R., An overview of the mining history, geology, mineralogy, and amphibole-asbestos health effects of the Rainy Creek igneous complex, Libby, Montana, U.S.A.; A case study in teaching environmental mineralogy. Presented at NAGT Workshop on Geology & Health, May 2004;
<http://www.webpages.uidaho.edu/~mgunter/NAGT/manuscripts/BandliMS.pdf>
(enclosed)

Vu, V.T., Regulatory Approaches to Reduce Human Health Risks Associated with Exposures to Mineral Fibers, published as Chapter 19 in *Health Effects of Mineral Dusts*, Guthrie, G.D. & Mosman, B.T., eds., Washington D.C., Mineralogical Society of America, 545-554.28 (enclosed)

Thank you very much for your consideration.

Sincerely,



R. Craig Hupp

c: Paul Kurzanski, Jeffrey Styron, Terri Rubis, Fredrick Dindoffer

¹ These materials are offered with regard to the question whether the forms of asbestos found in Libby ore are regulated and hence fall under CERCLA, not whether they pose a health hazard.



STATE OF MICHIGAN

DEPARTMENT OF COMMUNITY HEALTH
LANSINGJENNIFER M. GRANHOLM
GOVERNORJANET OLSZEWSKI
DIRECTORFOR IMMEDIATE RELEASE
November 9, 2004CONTACT: T.J. Bucholz
(517) 241-2112

Past Workers At Dearborn Plant Were Exposed To Hazardous Asbestos Levels

Workers at the former W. R. Grace & Company vermiculite exfoliation plant in Dearborn – from the early 1950s to 1990 – were exposed to hazardous levels of asbestos, according to a public health consultation from the Michigan Department of Community Health (MDCH) and the federal Agency for Toxic Substances and Disease Registry (ATSDR).

Until 1990, the former W.R. Grace facility processed vermiculite – mined in Libby, Montana – that contained asbestos. ATSDR has linked some past exposures to Libby vermiculite to respiratory illnesses.

The consultation also indicated that those who lived with former W.R. Grace workers while Libby vermiculite was being processed at the plant also were exposed to asbestos. Workers may have carried home asbestos fibers on their hair and clothing, but the degree to which household members may have been exposed cannot be conclusively determined, according to MDCH officials.

MDCH and ATSDR found no indication that current workers on the property – employed by a tool and die shop – are being exposed to hazardous levels of asbestos. Some soil samples from the site, taken by the Environmental Protection Agency (EPA), show concentrations of asbestos at very low levels. Other samples failed to detect asbestos.

Officials also suspect that some former workers and residents took asbestos-contaminated waste rock home from the plant and used it around their homes (for example, for driveway and garden filler). People could still be exposed to small amounts of this asbestos today if any waste rock remains exposed and is disturbed (by foot or vehicle traffic, for example).

MDCH and ATSDR recommends that former workers and the household members who lived with them learn more about asbestos and see a doctor with expertise in asbestos-related lung diseases. "MDCH can help you learn more as well as provide assistance in locating such medical expertise," said Erik R. Janus, toxicologist for the MDCH Bureau of Epidemiology.

The former W.R. Grace plant health consultation was done in cooperation with ATSDR and is part of that agency's National Asbestos Exposure Review (NAER). Under the program, more than 200 sites around the United States that received vermiculite ore mined in Libby from the early 1920s until 1990 are being evaluated. More information about NAER is available online at <http://www.atsdr.cdc.gov/naer/index.html>.

MORE

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The ATSDR/MDCH public health consultation is available for review at the Dearborn Public Library (16301 Michigan Avenue, Dearborn) or the Arab Community Center for Economic and Social Services (6450 Maple Street, Dearborn). It also is available on-line at <http://www.michigan.gov/mdch-toxics/> or <http://www.atsdr.gov/naer/dearbornmi>.

MDCH welcomes comments and information from community members about the health consultation and the site contamination. Questions and MDCH's responses will be published later in a separate document. A public availability session in Dearborn will be held in the near future with members of the MDCH, ATSDR and EPA present. The primary purpose of this meeting is to field questions, comments, and concerns regarding both the document and potential exposure to asbestos-contaminated vermiculite. Questions on the health consultation document must be submitted in writing to:

Erik R. Janus
Division of Environmental and Occupational Epidemiology
Bureau of Epidemiology
Michigan Department of Community Health
3423 N. Martin Luther King Jr. Blvd.
P.O. Box 30195
Lansing, MI 48909

For more information, community members may contact Erik Janus with the Michigan Department of Community Health, Bureau of Epidemiology toll-free at 800-648-6942, or via electronic mail at januse@michigan.gov.

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